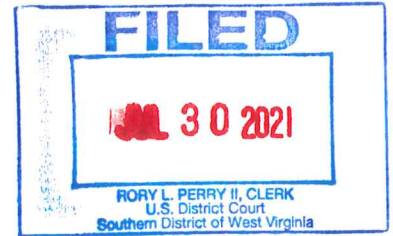


**SEALED**

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON GRAND JURY 2020  
JULY 28, 2021 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO

1:21-cr-00131

18 U.S.C. § 844(n)  
18 U.S.C. § 844(h) (1)  
18 U.S.C. § 2  
18 U.S.C. § 1343

DOUGLAS VINEYARD  
SCOTT MEADOWS

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE  
(Arson Conspiracy)

Background

At all times material to the Indictment:

1. 1746 Princeton Avenue, Bluefield, Mercer County, West Virginia, (Bluefield property) was an unoccupied residential property located in the Southern District of West Virginia.

2. Allstate Insurance Company (Allstate) headquartered in Northbrook, Illinois, and with offices throughout the United States, provided insurance coverage for the Bluefield property for casualty losses due to, among other things, fire damage, and post-fire cleanup costs.

The Conspiracy

3. Beginning no later than July 1, 2019, through at least January 15, 2020, at or near Bluefield, Mercer County, West Virginia, within the Southern District of West Virginia, and elsewhere, defendants DOUGLAS VINEYARD and SCOTT MEADOWS, together with others known and unknown to the Grand Jury, knowingly conspired to commit offenses in violation of 18 U.S.C. § 844(h)(1), that is, to use fire to commit felony offenses which may be prosecuted in a court of the United States.

4. The felony offenses constituted wire fraud (18 U.S.C. § 1343), in connection with the fire at Bluefield property.

In violation of Title 18, United States Code, Section 844(n).

**COUNT TWO**  
**(Arson to Commit Wire Fraud)**

5. The Grand Jury realleges and incorporates by reference paragraphs 1-4, as if fully set forth herein.

6. On or about August 6, 2019, at or near Bluefield, Mercer County, West Virginia, within the Southern District of West Virginia, and elsewhere, defendants DOUGLAS VINEYARD and SCOTT MEADOWS, together with others known and unknown to the Grand Jury, aided and abetted by each other, did knowingly use and cause the use of fire to commit felony offenses which may be prosecuted in a court of the United States.

7. The felony offenses constituted wire fraud (18 U.S.C. § 1343) in connection with the fire at the Bluefield property.

In violation of Title 18, United States Code, Sections 844(h)(1) and 2.

**COUNTS THREE-SIX**  
**(Wire Fraud)**

8. The Grand Jury realleges and incorporates by reference paragraphs 1-7, as if fully set forth herein.

The Scheme to Defraud

9. Beginning no later than July 1, 2019, through at least January 15, 2020, at or near Bluefield, Mercer County, West Virginia, within the Southern District of West Virginia, and elsewhere, defendant DOUGLAS VINEYARD and SCOTT MEADOWS, together with other persons known and unknown to the Grand Jury, acting with an intent to defraud, knowingly devised and intended to devise a scheme and artifice to defraud Allstate, and to obtain money from Allstate by means of false and fraudulent pretenses, representations, and promises, all related to the Bluefield property.

Specific Acts to Carry Out the Scheme

10. On or about July 1, 2019, DOUGLAS VINEYARD purchased the Bluefield property for the purchased price of \$5000.

11. On or about July 2, 2019, the deed showing the purchase of the Bluefield property by DOUGLAS VINEYARD was filed in the Mercer County Courthouse.

12. On or about July 31, 2019, DOUGLAS VINEYARD purchased an insurance policy from Allstate for the Bluefield property. The insurance policy included coverage of approximately \$285,500 for the dwelling, \$142,750 for the contents, and \$14,275 for other

structures. According to the insurance application, DOUGLAS VINEYARD falsely represented he purchased the Bluefield property for \$50,000.

13. On a date unknown, but before August 6, 2019, DOUGLAS VINEYARD and SCOTT MEADOWS agreed to burn the Bluefield property. As part of the scheme, DOUGLAS VINEYARD solicited two other individuals ("Known Person A" and "Known Person B") to assist them in burning the property for the insurance money. In exchange for their assistance, "Known Person A" and "Known Person B" were to receive a monetary payment.

14. On or about August 6, 2019, in the early morning hours, "Known Person A" drove SCOTT MEADOWS and "Known Person B" to the Bluefield property. SCOTT MEADOWS and "Known Person B" then went to the side of the property. "Known Person B" opened the door to the property with a knife. SCOTT MEADOWS entered the Bluefield property and set the fire. Once the fire was set, SCOTT MEADOWS and "Known Person B" met "Known Person A" up the street from the Bluefield property. "Known Person A" then sent a one-word text message to DOUGLAS VINEYARD consisting of the word "Done," indicating the fire had been set. The Bluefield property was a total loss.

15. On or about August 6, 2019, DOUGLAS VINEYARD telephonically reported the fire to Allstate and provided notice

of loss resulting from the fire at the Bluefield property. Allstate assigned a claim number for the Bluefield property.

16. Thereafter, DOUGLAS VINEYARD prepared and submitted fraudulent insurance claims, made materially false and misleading statements, and prepared and submitted false and fictitious documents and other records to Allstate, to obtain payments for the claimed loss. DOUGLAS VINEYARD faxed a Sworn Statement of Proof of Loss, among other documents, seeking \$285,500 for the Bluefield property.

17. By letter dated November 26, 2019, Allstate informed DOUGLAS VINEYARD that his claim was denied. Allstate incurred approximately \$13,140.40 in expenses investigating the claim.

18. By letter dated January 13, 2020, Allstate provided notice to DOUGLAS VINEYARD that his policy was voided due to material misrepresentations in the application.

Wire Transmissions to Execute the Scheme to Defraud

19. On or about the dates listed below for each count, at or near the specified place in the Southern District of West Virginia, and elsewhere, defendants DOUGLAS VINEYARD AND SCOTT MEADOWS, together with other persons known and unknown to the Grand Jury, having devised and intending to devise the above-described scheme to defraud Allstate, and for the purpose of executing the scheme to defraud, knowingly transmitted and caused to be transmitted by means of wire and radio communication in interstate commerce the


writings, signs, signals, pictures, and sounds described below for each count, each transmission constituting a separate count:

COUNT	DATE	INTERSTATE TRANSMISSION	FROM	TO
3	8/6/2019	Telephonic reporting of fire and providing notice of loss to Allstate re: fire at Bluefield property	Thorpe, McDowell Co., WV	Cheyenne, WY
4	8/16/2019	Fax transmittal of sworn statement of Proof of Loss for \$285,500	Welch, McDowell Co., WV	Dallas, TX
5	9/25/2019 at 10:40 a.m.	Fax transmittal of authorization form	Welch, McDowell Co., WV	Dallas, TX
6	9/25/2019 at 2:21 p.m.	Fax transmittal of authorization form	Welch, McDowell Co., WV	Dallas, TX

All in violation of Title 18, United States Code, Section 1343.

LISA G. JOHNSTON  
Acting United States Attorney

By:

  
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R. GREGORY McVEY  
Assistant United States Attorney